

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

---

CELESTE CARPENTER,  
Plaintiff,

CASE NO.

vs.

TRANSUNION RENTAL SCREENING  
SOLUTIONS, INC. and X, Y, Z  
CORPORATIONS,  
Defendants.

---

TRANS UNION, LLC'S NOTICE OF REMOVAL

---

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC ("Trans Union") hereby removes the subject action from the Court of Common Pleas of Bucks County, Pennsylvania, to the United States District Court for the Eastern District of Pennsylvania, on the following grounds:

1. Plaintiff Celeste Carpenter served Trans Union on April 9, 2018, with a Precipe To Re-Issue Writ Of Summons and Writ Of Summons filed in the Court of Common Pleas of Bucks County, Pennsylvania. Copies of the Precipe To Re-Issue Writ Of Summons and Writ Of Summons are attached hereto as **Exhibit A**, and **Exhibit B**, respectively. No other process, pleadings or orders have been served on Trans Union.
2. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* (the "FCRA"). See Exhibit A.

3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

4. Pursuant to 28 U.S.C. § 1441, *et seq.*, this cause may be removed from the Court of Common Pleas of Bucks County, Pennsylvania, to the United States District Court for the Eastern District of Pennsylvania.

5. Notice of this removal will promptly be filed with the Court of Common Pleas of Bucks County Pennsylvania and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the Court of Common Pleas of Bucks County, Pennsylvania, to this United States District Court, Eastern District of Pennsylvania.

Date: 5/8/18

Respectfully submitted,



Casey B. Green, Esq.  
Sidkoff, Pincus & Green, P.C.  
2700 Aramark Tower  
1101 Market Street  
Philadelphia, PA 19107  
Telephone: (215) 574-0600  
Fax: (215) 574-0310  
E-Mail: [cg@sidkoffpincusgreen.com](mailto:cg@sidkoffpincusgreen.com)

*Counsel for Defendant TransUnion Rental  
Screening Solutions, Inc.*

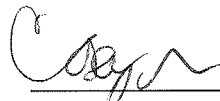
**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on the **8th day of May, 2018**. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

None.	
-------	--

The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the **8th day of May, 2018**, properly addressed as follows:

<b><u>for Plaintiff Celeste Carpenter</u></b> Vicki Piontek, Esq. 951 Allentown Road Lansdale, PA 19446	
--	--



Casey B. Green, Esq.  
Sidkoff, Pincus & Green, P.C.  
2700 Aramark Tower  
1101 Market Street  
Philadelphia, PA 19107  
Telephone: (215) 574-0600  
Fax: (215) 574-0310  
E-Mail: [cg@sidkoffpincusgreen.com](mailto:cg@sidkoffpincusgreen.com)

*Counsel for Defendant TransUnion Rental  
Screening Solutions, Inc.*